

Summary of May 27, 1999
Indiana Department of Environmental Management (IDEM) and
Clean Manufacturing Technology and Safe Materials Institute (CMTI)
Meeting with Metal Finishers and POTWs Participating in
CSI Metal Finishing Strategic Goals Program

The meeting was called to order at 10:10 a.m. by facilitator Kathy Watson. The facilitator explained the meeting objectives, but noted the times specified in the tentative agenda to address each agenda item would need to be modified in order to allow the group sufficient time to complete the action plan proposal for 1999. To develop the action plan, the facilitator recommended utilizing the white board and following template to assist the group in highlighting the key action steps and issues to be addressed by each stakeholder group:

CSI Metal Finishing Strategic Goals Program

<u>GOALS</u>	1. Improved resource utilization	2. Reduced hazardous emissions	3. Increased economic pay backs
	- 98% metals utilization	- 90% organic TRI chemicals &	- long term benefit from 1 & 2
	- 50% reduction water usage	50% metals (to air and water)	- 50% reduction in regulatory
		- 50% reduction in land disposal	costs
		of hazardous sludges	
		- 50% reduction in human exposure	
		to toxins	

METAL FINISHERS	POTWS	IDEM	EPA	DEPT. OF COMMERCE	CMTI
action items/issues to be determined based on consideration of work-group proposals	action items	action items	action items	action items to be determined	action items

Meeting participants were agreeable to utilizing this approach. After introductions by those in attendance (**meeting roster attached**), the following presentations were made:

REMARKS FROM IDEM

Tim Method, IDEM Deputy Commissioner, reiterated IDEM's support of the Strategic Goals Program (SGP) and noted the progress this stakeholder group has made and his appreciation for participants' time and interest. At today's meeting, we plan to clearly define what next steps and measures need to be taken and by whom in 1999 and beyond in order to continue making progress in achieving the facility performance goals.

NATIONAL/REGIONAL UPDATES

Matt Gluckman, EPA Region 5 SGP Co-Lead

1. Matt noted the upcoming Strategic Goals Program "Summit" to be held June 21-23, 1999 in Cincinnati, Ohio at the American Electroplaters and Surface Finishers Society (AESF) Sur-Fin '99 Convention and trade show. Matt stated the SGP summit will bring together various SGP stakeholders to share their work products, common issues of concern, and to brainstorm on program implementation. EPA Region 5; Shayla Barrett of CMTI; and Claudio Ternieden and Debbie Dubenetzky of IDEM plan to attend.
2. EPA is finalizing a "How To" guidance for local SGP implementation. A draft was distributed the end of April. The guidance addresses verification of performance criteria and recognition for incremental progress.

3. An industry survey has gone out in order to develop a national baseline to be used as a reference tool for what constitutes “best industry practices”.
4. The pretreatment streamlining rulemaking is moving forward at EPA and is to be proposed in June with a 60 day public comment period. The rulemaking includes monitoring oversight reductions.
5. Matt has noted the substantive issues raised in the four Indiana workgroup issue papers and indicated EPA can share progress with similar issues in other work going on around the country.

Ted Heemstra requested that when Debbie/IDEM attends the summit, that IDEM seek clarification on how the specific facility performance goal percentages were derived - who set them up and what’s the basis for those numbers. Debbie Dubenetzky commented that it was her understanding the facility-specific performance goals were the result of almost three (3) years of discussion and negotiation by the National CSI Metal Finishing Subcommittee of which John Craddock of Indiana was an active participant.

INDIVIDUAL WORKGROUP REPORTS

RCRA Issues Workgroup

Workgroup co-leads Gary Romesser of IDEM-RCRA and Mark Sutton of H.H. Sumco presented the content and recommendations included in the RCRA Workgroup’s issue paper, distributed prior to this meeting, as follows:

6. Gary explained that much of the time spent by the group was on research and discussion of delisting requirements for F006 waste or seeking a variance under current RCRA provisions from classification as a solid waste. Gary distributed a copy of 40 CFR 260.30 (Variances from classification as a solid waste) and 40 CFR 269.31 (Standards and criteria for variances from classification as a solid waste). These Federal provisions were adopted and incorporated by reference in Indiana rule 329 IAC 3.1-5-4.
7. Gary stated that the workgroup was not clear on the intent of proposed incentive #12 to “Allow on-site, in-house processing of hazardous wastes for SGP MF that attain the goals”. Gary did report that IDEM’s RCRA section is currently developing guidance on in-house processing of hazardous waste. Gary indicated it may be useful to determine what wastes SGP metal finishers want to treat on-site which was the basis for proposed SGP incentive #12.
8. Mark Sutton briefly explained the RCRA delisting process and indicated this currently takes about two years within Region 5 at a cost to a facility of about \$50,000 to \$60,000 the first year for sampling and analytical testing. Mark noted he has an eleven (11) page handout describing this process if any one is interested in a copy. Mark also noted Project XL work in Region 2 (i.e., Hadco) which involves the delisting of waste in order to send it to a smelter for metals recovery.
9. Mark indicated that IDEM had requested delisting authority from EPA Region 5 and that approval was expected in approximately one year.
5. Mark commented that if their F006 wastestream were delisted, the facility would then be classified as a small quantity generator which would result in increased metals utilization, decreased quantity of hazardous waste going to landfills, and increased economic payback.
10. Mark noted barriers associated with the current lack of state reciprocity for out-of-state shipments to smelters.
11. Gary described IDEM’s commitment from the March 31 SGP meeting to “fast-track” complete variance requests submitted by SGP metal finishers. Gary reported IDEM/RCRA’s history in responding to two (2) previous solid waste variance requests and indicated that a facility has to reapply annually. According to Dave Berrey of the RCRA Program, variance renewals should not be a problem to expeditiously process if the facility’s circumstances have not changed. Gary noted the two (2) month administrative notice requirement and that RCRA technical resources needed to process variance requests included Dave Berrey and possibly a chemist. Minimum processing time would probably take three to four (3-4) months.
12. Matt Gluckman noted that the national F006 workgroup is looking at waste characteristics, but any proposed regulations are probably a year beyond the completion of their work.

13. On the issue of state reciprocity for smelters, Gary raised the question whether the Strategic Goals Program could serve as the mechanism for addressing obstacles encountered due to the lack of state reciprocity between states for out-of-state shipments. Matt Gluckman responded that EPA Region 5 should see if they can assist on this since five out of the six Region 5 states have signed on to the Goals Program.
14. Tim Method commented that after IDEM received RCRA delisting authorization, the state should clarify for facilities what it takes to get a hazardous waste delisted.

Recommendations:

15. Gary recommended that the RCRA workgroup develop a “model variance request” for use by any interested SGP metal finishers. Matt Gluckman asked whether any companies present were interested in pursuing a variance request at this time. Company representatives did not comment.
16. Mark also recommended waiting for IDEM’s guidance on in-house processing of hazardous waste to see how it addresses SGP metal finishers concerns. The guidance is expected to be completed within a month.

POTW ISSUES

Sue Claussen of Michigan City spoke on behalf of workgroup lead Claudio Ternieden who was unable to attend today’s meeting. She thanked Matt Amor from the City of LaPorte WWTP for participating in the workgroup and extended an invitation to others to participate in the workgroup as well. Sue summarized the following proposals the workgroup feels the full stakeholder group should pursue in order to move the SGP forward in Indiana (workgroup issue paper distributed in advance of this meeting):

17. Pursue IDEM’s offer to go out and talk about the Goals Program to the local pretreatment programs.
18. Although the pretreatment delegation submission is ready, the Office of Water Management does not currently have the staff resources necessary for program delegation.
19. EPA delegation to Indiana for the Pretreatment Program is key in order to recruit other POTWs to join the SGP. With Indiana delegation, approval of local pretreatment ordinances/programs, should move through the process more quickly.
20. Matt Amor commented that relaxing local ordinances back to the categorical limits saves companies money by easing the regulatory burden due to reduced treatment costs. Matt indicated it would be useful to have a succinct written document summarizing what the rewards metal finishers and POTWs will see from SGP participation - information specifying if you do this, you will get this reward in return. He suggested a state article to trade publications summarizing where we’re at and what we’re trying to do.
21. Tim Goldy commented that word has not gotten out to metal finishers about the SGP. The majority of the 30 metal finishers in Elkhart were unaware of the program. Ten (10) of the 30 showed up for a recent roundtable meeting. The next roundtable meeting will be held sometime in July. More metal finishers need to be signed on to the SGP, but this probably won’t happen until there are clear incentives for doing so.

Elkhart has received several good ideas from local metal finishers concerning local incentives area metal finishers would like to see.

22. Sue Claussen asked Tim Method whether IDEM can commit to clarifying what the agency is going to do in order to secure adequate OWM resources before sending the delegation request to EPA. Tim responded affirmatively.
23. Matt Amor asked a question regarding on-site treatment of sludges in-house and a facility subsequently sending the by-products to the sanitary system. Matt Gluckman responded that these are centralized wastestreams only if the facility is bringing waste in from off-site.

Recommendations:

24. IDEM should prepare a letter where it clearly states its commitment to four (4) main incentives:
 - support, education and outreach to POTWs on regulatory issues;
 - develop a pretreatment program and rules necessary to gain full delegation from EPA Region 5;
 - statewide recognition (being addressed by the Recognition Workgroup); and
 - funding and grants for assistance in implementation at the local level.

Claudio Ternieden of IDEM will prepare a draft letter for presentation at the next stakeholder meeting.

25. Elkhart to take the lead on local ordinance and issues, although it was acknowledged actual changes may not

be seen until at least November.

Technical and Financial Assistance

Shayla Barrett reported that this workgroup met one time, and only for five (5) minutes since Shayla and Melanie Darke of the Indiana Department of Commerce were the only members in attendance. Shayla presented the following information as supplied by Melanie Darke of Commerce:

Financial Assistance:

26. The Indiana Development Finance Authority (IDFA) does have a loan program. The legislature sets in statute the guidelines for this program. As it stands right now, there is a strong tie to the creation of jobs, however, the IDFA board does have some discretion in evaluating applicants. Shayla reported that Melanie will be working with IDFA to consider a project for pollution prevention and one for SGP metal finishing signees.
27. Shayla also reported that the Strategic Development Fund was designed to assist manufacturing networks to leverage resources and address common problems. There is a possibility to obtain and utilize SDF monies to test new processes that will lessen environmental impacts. The SGP could be considered a “network” eligible to participate.
28. Shayla reported that CMTI, in conjunction with the Jasper Chamber of Commerce, has worked with the SDF and wood furniture industry located in the Jasper area to provide training to wood furniture manufacturers at a reduced rate. An in-kind match is required for these competitive grants.

Technical Assistance:

29. Shayla reiterated CMTI’s offer to continue to provide free technical assistance and technology transfer to interested metal finishers. Mark Stoddard (Indianapolis) and Doug Elliott (Northern Regional Office) of IDEM’s Office of Pollution Prevention and Technical Assistance are also available to assist companies - both are attending the meeting today.
30. Tim Method asked whether this assistance could include getting the message out about the SGP and providing a clearinghouse for the sharing of information. Shayla responded that CMTI does produce various newsletters and that Dr. Corson/CMTI wants Shayla to develop a newsletter specifically for the SGP.
31. Shayla reported that AESF and Indiana Industrial Operators Association newsletters were other potential means of distributing information about the program. Other possibilities include Indiana Water Pollution Control Association publications and developing a brochure to be left with metal finishers at the time of inspection. The brochures could also refer facilities to OPPTA, CMTI, and others for assistance.
32. Sue Claussen noted that she had obtained a copy of the baseline performance form metal finishers are asked to complete and submit soon after sign-on to the program. She suggested it may be useful to show them this form so they know what is expected by signing on.

Recommendation:

33. CMTI/OPPTA to provide technical assistance and technology transfer information as requested.
34. CMTI to distribute information about the SGP to their mailing lists.

RECOGNITION

Debbie Dubenetzky distributed four (4) handouts; the first 3 are recognition-related documents produced by IDEM:

- May/June issue of *Indiana Environment and Waste Materials Exchange* publication with a feature story on IDEM’s 5-Star Environmental Recognition Program being expanded to include child care centers. The mailing list for this publication is over 20,000 recipients and the mailing list is scheduled to be expanded in the near future.
- Application form/brochure for Indiana’s 5-Star Environmental Recognition Program for Vehicle Maintenance Shops which details what is required to earn the initial, 2nd, 3rd, 4th and 5th star.
- Brochure on the 5-Star Environmental Recognition Program for Drycleaners which includes a state map and names/locations of Indiana’s environmental leaders in drycleaning.

- Sample press release included in “Welcome Aboard Kit” metal finishers received from EPA after sign on. She also circulated agency press releases and web information related to awards and recognition programs, and Indiana pollution prevention leaders.

On behalf of the recognition workgroup, the following information was reported:

35. Most SGP metal finisher signees are not eligible for IDEM 100% Club eligibility because they are not considered “major” permit holders. Only Electrochemical Coatings qualifies for the 100% Club because their pretreatment permit is issued by the state. Pretreatment permits issued by delegated municipalities are not considered “major” permits for purposes of 100% Club eligibility. Given this scenario, the workgroup suggested the option of developing a 5-Star Environmental Recognition Program for metal finishers. The first star would be awarded based on 100% compliance and SGP sign-on; and the 3rd thru 5th stars could be linked to the SGP performance goals. Various recognition would come as a facility achieves another “star” on the performance ladder as they incrementally achieve SGP-related goals.
36. The group also looked at two (2) national models under development for rewarding progress, the percentage-based Chicago model and the cumulative-based model out of Statesville, North Carolina.
37. Al Mayo and Mark Sutton provided Debbie with information about the Marion County Hazardous Materials Planning Committee’s “Good Neighbor Program.” By making the Good Neighbor pledge, a company commits itself to a positive relationship with its neighbors through candid communication and community involvement. A similar requirement could be made a part of a 5-Star recognition program for metal finishers.
38. Debbie noted recognition for SGP metal finishers could come from IDEM and industry publications, the IDEM web page, and possibly at the Partners for P2 Conference to be held September 22 at the Valley Vista Country Club in Indianapolis.
39. Since the SGP is a “beyond compliance” program, it has been suggested that 25% fee rebates might be considered for SGP metal finishers; above the 10% fee rebates under consideration/review for 100% Club members achieving full compliance. Debbie indicated she could complete a draft survey form for SGP signees to assess their current fees and reporting, recordkeeping and sampling requirements and where they feel those requirements could be incrementally reduced in return for incremental progress toward the goals. These fees and requirements may be different for each company depending on their activities and where they operate. The possible implications of a 10% versus 25% fee rebate are unknown at this time.
40. Jerry Phillips asked whether anyone had issued local press releases concerning the companies and the SGP. Sue Claussen responded she felt locals were waiting on some good results to share with the public.
41. Judy Rogers commented she felt it was a great incentive to let it be known you are a good corporate citizen, especially for small companies located in communities suspect or critical of company operations.
42. Jerry Phillips expressed the need for more recognition on IDEM’s web page.
43. Nancy Norton sought clarification on the differences between the 100% Club versus a 5-Star Program. Tim Method responded that a 5-Star Program is industry-specific and current models in other sectors are available, the 100% Club is more for major permit holders and is currently under development. Mark Stoddard noted that in the Dry Cleaner 5-Star Program, there is industry input on awarding the 4th and 5th “stars.”
44. Matt Gluckman commented that the Chicago-area stakeholder group is looking at where the costs are, and making fees progressive. You pay “X dollars” now, but if you do this, your fees will be reduced to “X dollars.”
45. Tim offered some caution on our ability to reduce fees. The 100% Club is looking into the issue, but we cannot dictate what POTWs have to do.

The facilitator directed participants’ attention to the white board template being completed and asked what the metal finishers should specifically be doing. Comments included:

Kevin Frecker of Baycote responded that as far as capital investments and improvements go, many companies may already be as close as they can get to achieving the goals due to changes made in previous years.

Tim Method commented that through the trade associations and annual meetings, companies can obtain a lot of information on process-specific improvements made by other metal finishers.

Kathy Watson asked the metal finishers to benchmark their current status and evaluate where they stand now. Matt Gluckman asked whether companies knew what new equipment they needed to install to meet the goals. Kevin responded that companies may be looking more at process changes than new equipment. Shayla Barrett suggested going for Strategic Development Funds to target specific goals. Shayla reiterated that these are grant dollars and require an in-kind match. He asked if there was any interest in joining forces to pursue Strategic Development Funds assuming the SGP would qualify as a network. Response was positive that the group was interested.

Jim Baldwin of Triplex Plating indicated that metal finishers need technical assistance. Shayla Barrett responded that CMTI provides technical assistance services free of charge.

Sue Claussen noted that in the past, students of Dr. Ketchum at Notre Dame have conducted energy audits. Al Mayo of Commercial Plating commented that this goes back to awareness of the Goals Program. He thinks most metal finishers work with consultants and others who don't know about or support the SGP.

There is a need to get more attention and support for the Goals Program. Perhaps operator certification courses could be one means of getting information out to people through Chris Hightower of IDEM.

Jerry Phillips stated that we still have not produced a "state document" comparable to what Carol Browner of EPA used in launching the SGP for initial sign-on during a major public forum. Sue Claussen responded that we wanted to work on developing the Indiana program first.

Tim Method stated there are many ways to package and market the program. IDEM is committed to put materials together prior to public announcements. However, recruitment should not just be the responsibility of IDEM.

Jerry Phillips suggested that the first AESF-Indianapolis Branch meeting to be held in September or October 1999, could serve as the publicized forum to promote the Goals Program.

Matt Gluckman reminded participants of the need to develop a verification process for the proposed 5-Star Program. Verification could come from a state or local level stakeholder group.

Based on the workgroup presentations and discussions noted above, the proposed SGP Action Plan completed using the white board template is presented below:

CSI Metal Finishing Strategic Goals Program

<u>GOALS</u>	1. Improved resource utilization	2. Reduced hazardous emissions	3. Increased economic pay backs
	- 98% metals utilization	- 90% organic TRI chemicals &	- long term benefit from 1 & 2
	- 50% reduction water usage	50% metals (to air and water)	- 50% reduction in regulatory
		- 50% reduction in land disposal	costs
		of hazardous sludges	
		- 50% reduction in human exposure	
		to toxins	

<u>METAL FINISHERS:</u>	<u>Action Item</u>	<u>Due Date</u>
	- on-site treatment	per IDEM guidance - summer 1999
	- segregate sludges (Baycote to document and share their experiences)	early fall 1999
	- recruitment (SGP goals 4 & 5)	
	- pursue audits for: - emissions - capital improvements	1999, in conjunction with CMTI, IDEM and Indiana OSHA

- compliance status

consider IDEM's self-disclosure and

environmental audit policy

- pilot project with State Development Fund grant

1999 - 2000

POTWs:

Action Item

Due Date

- ordinance changes

Elkhart to assume lead

- Sampling, reporting, recordkeeping changes

pursue in 1999 in conjunction with proposed Metal Finishing 5-Star Recognition Program

- recruitment

IDEM:

Action Item

Due Date

- fast-track variance requests

pursue now

- prepare guidance for on-site processing of hazardous waste

complete in summer 1999

- authorization for F006 delisting

approximately one year until authorization

- share information on sludge segregation

- support, education, & outreach to POTWs - Claudio to draft letter

summer 1999

- IDEM pretreatment delegation

- funding & grants to POTWs (OPPTA)

1999

- 5-Star Recognition Program

summer 1999

- Good Neighbor Program

- various press

- fee rebates

- reduction in sampling, reporting, recordkeeping (local issues)

- recruitment - develop proposal

late summer 1999

- contact waste treatment consultants

EPA REGION 5:

Action Item

Due Date

- F006 delisting (2 years)

- segregate sludge (share info)

summer 1999

INDOCs:

<u>Action Item</u>	<u>Due Date</u>
- IDFA loans for metal finishers	
- Strategic Development Fund grants	1999 - 2000

CMTI:

<u>Action Item</u>	<u>Due Date</u>
- technical assistance	available NOW
- disseminate information to participants	summer 1999
- develop proposal for	1999
- energy audits	
- technical audits	
- compliance audits	

NEXT STEPS

Next steps offered by Tim Method:

46. Prepare summary and proposed workplan from today's meeting and send to distribution list by end of June.
47. Workgroups to meet again in June as required.
48. Next full stakeholder meeting to be held in August (at latest).
49. Public announcement(s) of the Goals Program in August or September.

The facilitator adjourned the meeting at 12:25 p.m.